

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOHN HANCOCK LIFE INSURANCE)	
COMPANY, JOHN HANCOCK)	
VARIABLE LIFE INSURANCE)	
COMPANY, and MANULIFE)	
INSURANCE COMPANY (f/k/a)	Civil Action No. 05-11150-DPW
INVESTORS PARTNER LIFE)	
INSURANCE COMPANY),)	
)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	
)	
ABBOTT LABORATORIES,)	
)	
<i>Defendant.</i>)	

**ABBOTT LABORATORIES' MOTION
FOR IMPOUNDMENT OF CONFIDENTIAL INFORMATION**

Pursuant to Local Rule 7.2, Defendant Abbott Laboratories ("Abbott") respectfully moves this Court for leave to file Defendant's Memorandum in support of the Motion to Strike Untimely Allegations in the Second Amended Supplemental Complaint and Affidavit of Eric J. Lorenzini and the exhibits thereto under seal.

Abbott respectfully requests that the above referenced documents be impounded until further Order of the Court. In addition, Abbott respectfully requests that the Court accept the documents provisionally under seal pending the Court's ruling on this Motion. Upon termination of the impoundment period, Abbott will retrieve and take custody of the documents.

The grounds for this motion are that the above referenced documents contain confidential and competitively sensitive information regarding Abbott and other pharmaceutical companies' development of various drug compounds. Disclosure of the information contained in these documents could cause competitive harm by providing competitors with proprietary information

regarding Abbott's drug development program, as well as its market analysis and business strategies. Hancock does not oppose this motion.

Dated: November 29, 2007

Respectfully submitted,

ABBOTT LABORATORIES

By: /s/ Michael S D'Orsi
Michael S D'Orsi

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Counsel for Abbott Laboratories

LOCAL RULE 7.1 CERTIFICATION

The undersigned hereby certifies that counsel for Abbott Laboratories has conferred with counsel for Plaintiffs in a good faith effort to resolve or narrow the issues in this Motion. Plaintiffs' counsel has confirmed that Plaintiffs do not oppose this motion.

_____/s/ Michael S. D'Orsi_____

Date: November 29, 2007

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on November 29, 2007.

Date: November 29, 2007.

_____/s/ Michael S. D'Orsi_____

Michael S. D'Orsi